

**IN THE UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

In re:)
)
Howard Eugene Reynolds and) Case No. 08-61012-ABF
Shirley Rea Reynolds,)
Debtors.)

**TRUSTEE'S MOTION TO DEPOSIT FUNDS INTO THE REGISTRY
WITH CERTIFICATE OF SERVICE**

COMES NOW Fred Charles Moon, Chapter 7 Trustee, and moves the Court to order the deposit of the following uncashed distributed dividend funds into the Registry:

One uncashed 08/10/11 Final Report distribution check #10113 in the amount of \$288.93 to Creditor Roundup Funding, LLC, MS 550, P. O. Box 91121, Seattle, Washington 98111-9221 (Claim #11), that remained outstanding for over ninety (90) days and on which the Trustee issued a "Stop Payment" on November 9th, 2011;

The Trustee contends that creditor Roundup Funding, LLC should still have the right to claim said funds and, in order to bring closure for this bankruptcy case, Trustee believes it would be in the best interest of all parties to deposit said funds into the Court's Registry.

The Trustee has determined that if the uncashed funds of \$288.93 were distributed out to the other six remaining unsecured creditors that did not receive 100% of their allowed filed claims that have a combined total remaining unpaid balance of \$41,951.52, said distribution would be of inconsequential value to said creditors.

WHEREFORE the Trustee prays:

- (1) That the Court enter an Order authorizing him to pay to the Clerk of the United States Bankruptcy Court the sum of \$288.93 in uncashed distributed dividends to be deposited into the Registry Fund; and
- (2) That the Court enter an Order sustaining the request for affirmative relief contained herein and confirming the relief requested herein and that any such Order incorporate the Motion and relief requested therein by reference, including its file document

docket number with the Office of the United States Bankruptcy Clerk, Western District of Missouri; and

- (3) That the Court grant such other and further relief as it deems just and proper under the circumstances.

Dated this 10th day of November, 2011.

MOON & MOON
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/s/Fred Charles Moon
FRED CHARLES MOON
CHAPTER 7 TRUSTEE

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the forgoing instrument was served upon:

1. Ms. Nancy J. Gargula, United States Trustee, United States Courthouse, 400 East Ninth Street, Room 3440, Kansas City, Missouri 64106;
USTPregion13.KC.ECF@usdoj.gov
2. Mr. Jerry L. Phillips, Trial Attorney for the United States Trustee's Office, United States Courthouse, 400 East Ninth Street, Room 3440, Kansas City, Missouri 64106;
Jerry.L.Phillips@usdoj.gov
3. Mr. Ted L. Tinsman, Attorney for Debtors, 1910 East Battlefield, Suite B, Springfield Missouri 65804;
ted@thecourtneylawfirm.com
4. Roundup Funding, LLC (Claim #11), MS 550, P. O. Box 91121, Seattle, Washington 98111-9221; and
5. All other parties requesting notice;

by electronic filing or by depositing a copy of same in the U.S. Mail, postage prepaid on this 10th day of November, 2011.

/s/Fred Charles Moon
FRED CHARLES MOON
CHAPTER 7 TRUSTEE